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**IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE**

VICKI R. SEIDEL

Plaintiff,
 v.

UNITED STATES OF AMERICA,

Defendant.

CASE NO: 5:07-CV-03141 - JF
 Honorable Judge Jeremy Fogel
 MOTION FOR LEAVE TO
 FILE SUPPLEMENT TO MEMORANDA
 SUPPORTING MOTION
 FOR PRELIMINARY INJUNCTION

**MOTION FOR LEAVE TO FILE SUPPLEMENT TO MEMORANDA SUPPORTING
 MOTION FOR PRELIMINARY INJUNCTION**

Comes now the defendant, Vicki R. Seidel, by and through her attorneys of record, Robert Alan Jones and Chris Dietrich, and pursuant to Local Rule 7-3 (d) moves for leave to supplement the record: memoranda supporting motion for preliminary injunction (Document No. 20).

This motion, pursuant Local Rule 7-3(d) is based on a new case analyzing the relationship between the Taxpayer Bill of Rights specifically I.R.C. 6330, including the right of every person to have a due process notice, and right to a hearing prior to seizure of his or her property, and the Court's duty to suspend IRS collections irrespective of proof of irreparable harm proven by the person who is the object of the collection action. The case is *Swinford v. United States*, 2007 WL

1 496376 (W.D.Ky.) While not controlling, the analysis will aid this honorable Court in this matter.

2 WHEREFORE, the Plaintiff prays that the Court grant the instant motion granting the
3 Plaintiff Leave to File the attached Supplement to Memoranda Supporting Motion for Preliminary
4 Injunction.

5 DATED: This 11th day of July, 2007.

6 Respectfully submitted,

7
8 /s/ Robert Alan Jones
9 Robert Alan Jones, Esq.
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14 /s/ Chris Dietrich
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CERTIFICATE OF SERVICE

This is to certify that on July 11, 2007, I caused to be served the foregoing **MOTION FOR LEAVE TO FILE SUPPLEMENT TO MEMORANDA SUPPORTING MOTION FOR PRELIMINARY INJUNCTION and SUPPLEMENT TO MEMORANDA SUPPORTING MOTION FOR PRELIMINARY INJUNCTION**, using the electronic court filing system, and will be distributed to all parties shortly after its filing.

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Dated this 11th day of July, 2007.

/s/ Stephanie Burton
Office of Robert Alan Jones